IAG Terms and Conditions

1. The **Department of Commerce**, certifies: (1) that any indirect costs included in billings to EPA represent, in accordance with GAO principles, indirect costs that are funded out of the performing agency's currently available appropriations and that bear a significant relationship to the performing of the service or work, or (2) that statutory authority exists for charging other than these costs of performance. If an audit determines that any direct or indirect costs charged to EPA are unallowable, EPA will be notified immediately following the resolution of the audit, and EPA will be credited for those costs.

2. As a recipient of monies under this IAG, **Department of Commerce**, must ensure to the fullest extent possible that at least 8% of funds for prime or subcontracts and subgrants for services are made available to businesses owned or controlled by socially and economically disadvantaged individuals, women-owned businesses, and Historically Black Colleges and Universities.

3. The **Department of Commerce**, must submit a report to EPA showing the actual amount and percentage of extramural funds awarded to Disadvantaged Business Enterprise's (DBE) on EPA Forms 6005-3, "Superfund Minority Contractors Utilization Report", and 6005-3A, "Superfund Minority Contractors Utilization Report - Part 2", by November 15, of each calendar year. Reports should be submitted to:

Office of Small and Disadvantaged
Business Utilization (123OC)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

4. The **Department of Commerce**, agrees to meet the site-specific financial management and cost recovery record keeping requirements set forth in the handbook, dated January, 1989 "Superfund Financial Management and Record keeping: Guidance for Federal Agencies". All such records must be maintained for a least ten years from the date of submission of the final payment, after which written approval must be obtained from the EPA award official before disposing of any records.

5. When requesting payments, a breakdown of the costs associated with the billing request must be provided to the EPA Project Officer (PO). (The breakdown of the costs should be at least by budget category as indicated on this Interagency Agreement's page 2 "Approved Budget", BOX 22.) The breakdown of cost information should be adequate to allow the PO to determine that costs billed to EPA are necessary and reasonable. If the information is not provided, the EPA PO will notify the Cincinnati Financial Management Division to suspend or charge back the payment.

6. This IAG involves the generation of environmental data. A Quality Assurance Project Plan (QAPP) must be developed for the activities planned. The EPA guidance document, "EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations," (EPA QA/R-5, Interim Final, August, 1994), or any guidance that supersedes this document, should be used when preparing the QAPP. The QAPP must be approved by the EPA Project Officer, the EPA Region 9 Quality Assurance

Manager, and the IAG recipient's quality assurance manager, before measurement activities are undertaken. The QAPP should be submitted to EPA no later than August 15, 2002.

- End of Document -

July 2002

STATEMENT OF WORK
EPA REGION 9/NOAA IAG
Palos Verdes Shelf Superfund Investigation
Los Angeles, California

I. PURPOSE

The U.S. Environmental Protection Agency (EPA) and the National Oceanic and Atmospheric Administration (NOAA), through the Montrose Settlements Restoration Program (MSRP), are both planning to undertake public outreach and fish monitoring activities related to the contaminated sediments at the Palos Verdes Shelf. The purpose of this Interagency Agreement (IAG) is to facilitate coordination between the two agency's, enhance the efficiency and effectiveness of each agency's efforts in these areas, and enable NOAA to provide technical services to EPA in areas of mutual interest with respect to the Palos Verdes Shelf.

II. BACKGROUND

Site Description and History

The Palos Verdes Shelf site is a large area of contaminated sediment located on the continental shelf and adjacent slope off the coast of the Palos Verdes peninsula in the county of Los Angeles, California. The primary contaminants of concern ("COCs") in the sediment can be grouped into two categories: 1) dichloro-diphenyl-trichloroethane ("DDT") and its metabolites, and 2) polychlorinated biphenyls ("PCBs").

Between 1950 and 1972, the Montrose Chemical Corporation of California manufactured the organochlorine pesticide DDT at its Torrance plant and discharged wastewater containing DDT to the local sewers, where it was conveyed to the Joint Water Pollution Control Plant ("JWPCP") owned and operated by the County Sanitation Districts of Los Angeles County ("LACSD"). Other commercial and industrial facilities discharged PCBs to the sewer system feeding the JWPCP. Wastewater from the JWPCP is discharged to the Pacific Ocean through submarine outfalls located off White's Point on the Palos Verdes peninsula. It is estimated that over 1,700 tons of DDT were discharged by the JWPCP from the late 1950s to the early 1970s. DDT & PCBs which passed through the JWPCP were discharged through the White's Point sewer outfalls, resulting in a large "effluent-affected" (i.e., contaminated) sediment deposit on the continental shelf and slope.

The DDT contamination on the Palos Verdes Shelf and in the Southern California Bight has been the subject of scientific

studies since the early 1970s. In 1990, federal and state natural resource trustees (collectively referred to as the "Trustees"), including NOAA, filed a natural resource damage claim against Montrose and other parties and began an extensive site characterization as part of a natural resources damage assessment ("NRDA") under CERCLA. The resulting expert reports were issued in October 1994. In July 1996, following a 19-month review of the data and information regarding contamination on the Palos Verdes Shelf, EPA formally initiated an engineering evaluation/cost analysis (EE/CA) under the Superfund program to evaluate both risks to human health and the environment and possible response actions to address those risks.

In 2001, the litigation over natural resource damage claims and future EPA cleanup actions was resolved when the last of four settlements with potentially responsible parties (PRPs) was approved by the District Court. These settlements provided funds to both EPA and the Trustees to undertake site cleanup response actions and resource restoration projects, respectively. Both groups are now actively planning and implementing their programs.

Nature and Extent of Contamination

The total volume of the effluent-affected sediment deposit is over 9 million cubic meters, with approximately 70% of this volume on the continental shelf (i.e., in water depths less than 100 m) and the remainder present on the continental slope. Virtually all of the deposit is contaminated with DDT (including its metabolites DDD and DDE) and PCBs. (Hereafter, "DDT" refers to the sum of DDT and its metabolites.) The footprint of DDT-contaminated sediment, delimited at the 1 part per million (ppm) surface concentration level of p,p'-DDE covers a sea floor surface area in excess of 43 square kilometers on the shelf and slope. The accumulated masses of DDT and PCBs at the PV Shelf have been estimated at 110 and 11 tons, respectively.

The area of highest DDT and PCB contamination is located on the continental shelf, and the maximum concentrations of DDT and PCBs within the sediment deposit are typically below the surface layer. The maximum concentration of DDT exceeds 200 ppm near the outfall pipes; concentrations in excess of 50 ppm extend up to 4 kilometers (km) to the west of the outfalls.

California EPA's Office of Environmental Health Hazard Assessment (OEHHA) and its predecessor agency, the California Dept. of Health Services (CDHS), have issued health warnings for consumption of certain fish off Palos Verdes and other Southern California sites because of elevated DDT and PCB levels. These have been included in the California sport fishing regulations since March 1992. In 1985, the LA County Dept. of Health Services, under State guidance, posted warnings along the shore

of Santa Monica Bay and Palos Verdes to discourage consumption of white croaker. In 1990, the California Dept. of Fish and Game closed commercial fishing of white croaker on the Palos Verdes Shelf and nearby areas due to health risks posed by DDT and PCB contamination. Commercial fishing for other species of fish is permitted.

Status of Site

In July 1996, EPA began the Superfund investigation known as an Engineering Evaluation/Cost Analysis (EE/CA) for the Palos Verdes Shelf. The primary activities under the EE/CA were a streamlined human health and ecological risk assessment, along with an evaluation of response action technologies and alternatives focused on in-situ capping options and institutional controls (along with the no action alternative). In March 2000, EPA completed the EE/CA report on the Palos Verdes Shelf and released it for public comment, along with EPA's proposed institutional controls response action to address human health risks (a combination of public outreach, monitoring and enforcement). Following the public comment period, EPA issued an Action Memorandum in September 2001 and has begun implementation of the institutional controls program. EPA's evaluation of capping is still ongoing.

III. DESCRIPTION OF TASKS

Pursuant to this IAG, NOAA will perform one or more of the following tasks as directed by EPA's Remedial Project Manager (RPM) for the Palos Verdes Shelf:

- ☐ Task 1: Project Management and Reporting
- ☐ Task 2: Angler Community Characterization and Outreach
- ☐ Task 3: Fish Sample Collection and Analysis
- ☐ Task 4: Public Outreach Support

These tasks will include the responsibilities and activities described below.

Task 1: Project Management and Reporting

1) Provide overall technical and financial management of the project;

2) Direct and monitor NOAA resources;

3) Coordinate activities with and receive direction from the EPA RPM;

4) Maintain overall responsibility for keeping the project on schedule and within the approved IAG budget; and

5) Provide reporting to EPA as described under Special Conditions and assist EPA in responding to comments on and questions about the work performed by NOAA for EPA.

Task 2: Angler Community Characterization & Outreach

Both EPA and NOAA need to communicate effectively with anglers in the process of developing and implementing their respective programs. As part of its institutional controls response action, EPA plans to conduct outreach activities for recreational fishing community, which include characterizing the angler community for the purpose of targeting future outreach activities more effectively and efficiently. Such a study is also a critical up-front item for the MSRP, as it will be used not only to define the communities affected by the injuries in the case, but also to develop targeted outreach programs to involve those communities in the restoration planning effort, already underway.

EPA has conducted some work with community-based organizations ("CBOs") to assist in determining the ethnic communities that need to be addressed in the outreach efforts, and which outreach methods and materials are most effective for a given community. Heal the Bay conducted a brief pier survey in the summer of 2001 which generated some recent information on the demographics of the angler community. However, the latest comprehensive effort to collect angler information was completed in 1991 by the Santa Monica Bay Restoration Project, and there is a clear need to update these data, as well as expand the study area into Orange County.

The general public has already expressed difficulty in separating out the roles and responsibilities of EPA versus the Trustees (i.e., site remediation and mitigating the human health risks associated with the consumption of contaminated fish versus restoring the natural resources injured by the discharges). To the public, and indeed in actuality, these responsibilities are related, together forming the complete approach toward resolving the issues caused by the contamination. There is an obvious need for coordination between the two programs, and independent execution will undoubtedly result in fiscal inefficiencies and potentially conflicting messages sent to the public about "clean" fishing and opportunities created for that purpose. Commercial fishing issues, sports fishing concerns, and subsistence fishing activities have all been affected by the discharges in question, and for EPA and the Trustees to execute many of their outreach and education program tasks independently will result in sending

a message not only that government does not have the capability to work together across inter-agency lines, but that restoration and remediation dollars are being spent unwisely and ineffectively on duplicative efforts.

Accordingly, EPA and the MSRP plan to merge the common elements of their outreach programs efforts where appropriate, presenting to the public where possible a joint program that explains all sides of the efforts to clean up and restore the environment affected by the Montrose discharges.

2.1 Conduct Pier/Marina Angler Study

NOAA will conduct a study of anglers at piers and marinas serving fishing locations near to or impacted by contaminated fish from the Palos Verdes Shelf. The study will be conducted to determine such aspects of the angler community as ethnic composition, language capabilities, current knowledge of contamination issues, and preferred methods for receiving information. Information will be gathered to help guide the development of additional educational materials and outreach activities. Materials developed during EPA's pilot outreach project and/or through the ongoing work of the Seafood Contamination Task Force, may be distributed as part of this study, and anglers' understanding of these materials will be assessed.

Tasks necessary to complete the study include data collection method design and development, interviewing, data reduction, and analysis. It is anticipated that the methodology will be developed by a work group that includes representatives from NOAA, CDHS, EPA and other members of the Seafood Contamination Task Force. Due to the diversity of languages spoken in the fishing community, sampling of what languages are spoken at the chosen study areas may need to be conducted prior to actual interviewing.

2.2 Train Angler Study/Outreach Workers

NOAA will develop and implement a training program for workers who will interact directly with anglers at piers and marinas, etc. EPA anticipates that angler study and outreach activities will be conducted by a consortium of contractors, community-based organizations, environmental groups and agencies located in the greater Los Angeles area, with one entity serving as the central coordinating organization. Workers who conduct the study may include summer interns or temporary hires who will need a minimum amount of training to develop a familiarity with the general issues regarding contaminated fish and familiarity with the study methodology.

2.3 Create & Distribute Outreach Materials

Outreach materials (e.g., fact sheets) containing information on

fish and seafood contamination issues relevant to the recreational angler may be developed and/or reproduced in quantity for use as an outreach tool during the angler study. The materials will be easy to read and understand and may be prepared in multiple languages, as appropriate. The materials will include information about fish and fish contamination issues, especially the health advisory and emphasizing safer fish preparation and consumption practices.

Task 3: Fish Sample Collection and Analysis

Both EPA and the MSRP are developing fish sampling plans this year for implementation in September 2002. These sampling plans have several aspects in common, i.e., they envision the use of technical oversight boards, have similar sampling time frames, address the same and/or immediately adjacent geographic locations, and will occur over similar (2-3 year) time frames. The MSRP has already convened a comprehensive Scientific Review Board and is well underway toward completion of a draft sampling plan. EPA is currently a member of this board. The completion of the sampling plan, SOPs and QA/QC procedures all must be completed shortly in order to ensure that implementation of both programs can occur by September 2002.

The EPA program will involve sampling fish in the ocean (similar to the MSRP program) as well as fish from retail markets and restaurants. EPA's sampling program is needed to evaluate the effectiveness of fishing restrictions and enforcement actions in eliminating the presence of contaminated fish in public markets and restaurants, as well as to support public outreach activities regarding fish consumption advisories. EPA currently has a contractor developing the sampling and analysis plan for both the ocean and market/restaurant aspects of its program.
The primary purpose of the MSRP's study is to measure the geographic pattern of contaminant levels in various fish. The results of the study would be used to determine "clean" locations for fishers and to identify potential areas or sites for restoration projects such as constructed reefs that would increase the supply of "clean" fish for local anglers.

Joint implementation of the EPA and MSRP sampling plans will result in greater efficiency and consistency between the two programs. In many instances, EPA and the MSRP have overlapping data needs, as identified in the MSRP sampling plan, and as a result the two agencies will share in the cost of gathering that data. The sample collection phase of the market/restaurant program is obviously different than the ocean sampling, but the analysis of samples is essentially the same. Therefore, EPA has included the market/restaurant sample collection and analysis

within the scope of the work that may be performed under this IAG.

3.1 Fish-in-Ocean Sampling Program

As described in EPA's Action Memorandum, the primary purpose of the fish-in-ocean sampling program will be to assess whether the existing commercial fishing ban for white croaker provides consumers adequate protection from the purchase of contaminated white croaker, i.e., whether the current boundaries of the ban area are adequate. A secondary purpose is to provide data that will be useful and necessary for an effective public outreach & education program regarding fish consumption advisories. The actual parameters of the sampling and analysis program will be reviewed by an EPA Technical Review Board consisting of representatives from EPA and other agencies included on the MSRP's Scientific Review Board.

3.1.1 Work Plan for Fish-in-Ocean Sampling Program

EPA is using the original 1991 OEHHA Study as a baseline for design of the current EPA fish-in-ocean sampling program. The EPA study will include the sampling locations from the original study, as well as new locations in surrounding areas known for commercial white croaker fishing and/or areas where DDT- and PCB-contaminated fish are suspected to be present. In addition, sampling locations may include presumed "clean" areas in an effort to identify locations that will provide sport and commercial fishers access to safe white croaker and other fish. Table 1, which focuses on meeting the EPA's objectives with respect to the commercial catch ban area, presents tentative sites or locations for sample collection, as well as the tentative number and type of samples to be collected. The collection and analysis of fish for public outreach purposes will focus on locations with existing fish advisories. The actual locations will be determined after consulting and comparing plans with the MSRP and the SRB. EPA anticipates using an adaptive analysis approach in its sampling & analysis plan in which the decision to analyze some samples is based on the results from adjoining locations.

The fish-in-ocean sampling program will likely occur over a 2-year period, and will include multi-season sample collection. EPA will direct its contractor to collaborate with MSRP and members of the SRB to develop an EPA sampling and analysis plan that is focused on meeting the EPA objectives described above and consistent to the maximum extent practicable with the MSRP plans. It should be noted that EPA's sampling and analysis program must be designed in accordance with EPA's Superfund program requirements, including those for Quality Assurance Project Plans (QAPPs) and Field Sampling Plans (FSPs).

Table 1. Potential Locations for Sample Collection to Evaluate the White Croaker Commercial Fishing Ban Area

Sampling Site	Number/Type of Samples
Palos Verdes (NW side; north of existing commercial ban area)	5 composites (4 fish each) or 20 individual white croaker
Point Vicente	5 composites (4 fish each) or 20 individual white croaker
White Point	5 composites (4 fish each) or 20 individual white croaker
South of Point Fermin (new location), near Cabrillo State beach	5 composites (4 fish each) or 20 individual white croaker
Cabrillo Pier area	5 composites (4 fish each) or 20 individual white croaker
Pier J	5 composites (4 fish each) or 20 individual white croaker
Belmont Pier	5 composites (4 fish each) or 20 individual white croaker
West End of Sunset Beach	5 composites (4 fish each) or 20 individual white croaker
Huntington Beach/Newport Pier	5 composites (4 fish each) or 20 individual white croaker
Dana Point	5 composites (4 fish each) or 20 individual white croaker
Outside LA/Long Beach Harbor Middle Breakwater	5 composites (4 fish each) or 20 individual white croaker
Horseshoe Kelp	5 composites (4 fish each) or 20 individual white croaker
2 miles offshore of Cabrillo State beach	5 composites (4 fish each) or 20 individual white croaker
5 miles SE of Pt. Fermin	5 composites (4 fish each) or 20 individual white croaker
7 miles SSE of Middle	5 composites (4 fish

Breakwater	each) or 20 individual white croaker
West of PV Point (before Redondo Canyon	5 composites (4 fish each) or 20 individual white croaker
West of PV Point (north side of Redondo Canyon)	5 composites (4 fish each) or 20 individual white croaker

EPA will provide MSRP with a complete set of plans (i.e., FSP and QAPP) for its fish-in-ocean monitoring program that can be incorporated into the MSRP plan for the purposes of implementation. Under this IAG, the MSRP will combine its sampling plan with EPA's to create one sampling and analysis Work Plan for implementation, and apportion all associated costs appropriately, including the costs for development of standard reference material needed for lab analysis of the samples.

3.1.2 Implement the Fish-in-Ocean Sampling & Analysis Work Plan Actual implementation of the Work Plan will likely occur over a 2-year period, and will include collection of samples during multiple seasons, as appropriate. NOAA will provide for collection of fish and tissue samples through the use of a qualified and experienced contractor. This work will include development of the technical statement of work as part of the request for bids, and award and management of the contract(s) as necessary for studies. The technical statement of work will consist of plans and specifications and, where appropriate, quality assurance project plans (QAPPs), site safety plans, etc., and will be submitted to EPA for review before it is issued.

3.1.3 Laboratory Analysis
NOAA will evaluate and select the laboratory(ies) that will analyze the fish samples. In addition to performing the actual laboratory analyses, the laboratory will adhere to specific Quality Assurance/Quality Control (QA/QC) protocols and data validation criteria. For the purposes of developing a cost estimate for analysis of EPA samples under this IAG, it has been assumed that samples will be analyzed for DDT and PCBs. Additional analytes may be identified by EPA in its sampling plan design phase and included as appropriate, with a commensurate increase in the costs for lab analysis, data validation and reporting.

3.1.4 Data Validation and Evaluation
NOAA will provide for data validation of laboratory results, which will include, at a minimum, a review of holding times, field blanks, method blanks, quality control samples, and

detection limits. Analytical data will be evaluated and summarized following each sampling event, and results provided in a report to EPA.

3.1.5 Report

Within six months after each sampling event, NOAA will provide EPA with a comprehensive report presenting the results of fish sample collection and analysis, as well as recommendations for revisions to the sampling and/or analytical program, if warranted.

3.2 Market/Restaurant Fish Sampling Program

As directed by the EPA RPM, NOAA will implement the EPA work plans for the market/restaurant sampling and analysis program in a manner consistent with the procedures and requirements of fish-in-ocean sampling program described above.

Task 4: Public Outreach Support

1) Provide support for public meetings (development of presentation materials, scheduling, meeting logistics, meeting facilities, etc.) at which the results and/or status of the activities being performed pursuant to Tasks 2 and 3 of this IAG are presented.

2) Provide support for production of fact sheets and other public outreach materials related to the work performed pursuant to Tasks 2 and 3 of this IAG.

IV. MILESTONES AND DELIVERABLES

Task	Description	Proposed Schedule/Milestones
1	Status and Budget reports	Monthly
2.1	Work Plan for Angler Study	30 days after IAG execution
	Conduct angler study	Begin August 2002
2.1	Report on Angler Study	Draft by December 31, 2002; Final within 15 days after receiving EPA comments

2.2	Draft curriculum for training program	August 15, 2002
2.3	Draft and Final copies of outreach materials	Drafts by August 15, 2002; Finals within 15 days after receiving EPA comments
3.1.1	Provide NOAA with EPA sampling/analysis plans (QAPP, FSP, etc.) (prepared by EPA contractor)	August 15, 2002
3.1.1	Work Plan for implementation of EPA & MSRP plans	August 31, 2002
3.1.2	Technical statement of work	By September 1, 2002
3.1.2	Begin field work for initial fish sampling event	By October 1, 2002
3.1.2	Conduct additional fish sample collection	TBD (at approx. six month intervals)
3.1.5	Report of results, including data validation report, for each sampling event.	Within six months of completing EPA sample collection
3.2	Work Plan and schedule for implementation of market/restaurant fish sample collection	TBD

V. SPECIAL CONDITIONS

A. PROJECT MANAGEMENT

NOAA shall designate an overall Project Manager whose role will be to:

- direct and monitor NOAA resources (including NOAA personnel and contracting mechanisms) to accomplish the tasks in the IAG statement of work on schedule and within the approved IAG budget;
- receive broad direction from the EPA RPM on actions to be taken under this IAG;
- serve as the main point of contact with NOAA for the EPA RPM; and
- report to the EPA RPM on budget status and project

milestone status using the format and frequency described below.

When NOAA initially designates a Project Manager, EPA shall be given the opportunity to either accept or reject the designated individual based on an assessment of his or her technical and project management background and skills. This selection process will continue until EPA and NOAA have agreed upon a candidate. Should NOAA find it necessary to propose a change in Project Manager, NOAA shall once again propose a candidate subject to EPA's review. Should a change in Project Manager be necessary, a suitable transition period shall be negotiated between NOAA and the EPA Region 9 Site Cleanup Branch.

B. FIELD MANAGEMENT

For any field work conducted by NOAA for EPA under this IAG, NOAA shall designate an overall Field Representative whose role it will be to:

- receive direction from NOAA Project Manager;
- direct and monitor NOAA field resources (including NOAA personnel and contracting mechanisms) to accomplish the tasks in the IAG statement of work on schedule and within the approved IAG budget;
- receive broad direction from the EPA RPM during emergency situations when EPA has determined a situation has arisen that requires immediate response to mitigate a threat to human health or the environment, including the investigation of citizen complaints;
- report on an as-requested basis the overall status of field work to the NOAA Project Manager; and
- report during field work on an as-requested basis the status of current activities if requested by the EPA RPM.

NOAA will initially propose candidates for Field Representative and give EPA the opportunity to either accept or reject the designated individual based on an assessment of his or her technical and project management background and skills. This selection process will continue until EPA and NOAA have agreed upon a candidate. Should NOAA find it necessary to propose a change in Field Representative, NOAA shall once again propose a candidate subject to EPA's review. Should a change in Field Representative be necessary, a suitable transition period shall be negotiated between NOAA and the EPA Region 9 Site Cleanup Branch.

During field work without the presence of the EPA RPM, the designated Field Representative will have responsibility for

responding to direct requests from members of the community or others for information on current field activities. A record of such communication shall be maintained and forwarded to the EPA RPM.

NOAA personnel and its contractors shall have the appropriate health and safety training and be involved in a medical monitoring program as specified in 29 Code of Federal Regulations (CFR) Part 1910; 51 CFR 45663 - 45675; and Section 125(e) of CERCLA, as amended by SARA.

C. REPORTING

The designated Project Manager shall file quarterly budget and status reports directly with the EPA RPM. The reports shall cover all activity through the end of the reporting period (i.e., end of the quarter) and shall be submitted within fifteen days of the end of the reporting period. The budget status report may include the billing information sent to EPA's Servicing Finance Office in Cincinnati, but shall, at a minimum, include:

- site name as well as IAG number;
- a breakdown of expenses (personnel, travel and indirect costs) by IAG task and subtask, for the quarter and a cumulative total (this must match the lump sum on the SF-1080 submitted to the USEPA/Cincinnati Financial Management Center);
- a further breakdown of expenses identifying NOAA personnel costs and contracting costs;
- a designation of the percent of IAG task budget expended through the end of the reporting period;
- a projection as to whether the work is falling within budget; and
- a recommended corrective action should projections indicate that the project is not within budget.

The project status report shall include at a minimum:

- an overall project schedule broken out by task comparing the original IAG time line with actual milestones accomplished through the end of the reporting period;
- a narrative of significant events/activities (NOAA staff, contractors, subcontractors) during the reporting period;
- a list of deliverables submitted during the reporting period;
- a projection as to whether the work is falling within schedule;
- recommended corrective action should projections

indicate the project is not within schedule;

- a narrative documenting any major or minor changes to the tasks in the IAG statement of work agreed upon by EPA and NOAA;
- any key personnel changes;
- significant events/activities in the next reporting period; and
- a narrative projecting any major issues on the horizon identified by NOAA as needing resolution and a discussion of previously-identified issues resolved during the reporting period.

EPA will provide NOAA with a sample report format.

NOAA personnel shall perform management, design and field work services in accordance with Superfund procedures and record-keeping requirements. The Project Manager shall keep the EPA RPM fully informed of all activities, and shall coordinate all meetings, reviews, inspections, etc., with the EPA RPM to accommodate attendance.

Upon receipt or completion of any site investigation, study design or monitoring-related documents, the Project Manager shall submit a minimum of four copies to EPA to allow for comment by the EPA RPM, EPA technical support staff, the California Department of Toxic Substances Control (DTSC), and for Superfund record-keeping purposes. The Project Manager shall allow for a minimum of fourteen calendar days for response, beginning with the date of EPA's receipt.

D. DOCUMENTATION OF FIELD ACTIVITIES

Information gathered during field work shall be consistently documented and adequately recorded by NOAA and/or its contractor(s) in well maintained field logs and laboratory reports. The method(s) of documentation must be specified in the work plan and/or the SAP. Field logs must be utilized to document observations, measurements, and significant events that have occurred during field activities. Laboratory reports must document sample custody, analytical responsibility, analytical results, adherence to prescribed protocols, nonconformity events, corrective measures, and/or data deficiencies.

E. QUALITY ASSURANCE/QUALITY CONTROL

Sampling and analysis plans (SAPs), consisting of a field sampling plan (FSP) and quality assurance project plan (QAPP), must be prepared for sample collection and analytical activities.

The EPA guidance document, *Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans* (QAMS-005/80) (or any guidance that supersedes this document) and *U.S. EPA Region IX Guidance for Preparing Quality Assurance Project Plans for Superfund Remedial Projects* (September 1989) should be used when preparing the QAPP. The QAPP must be approved by the EPA Project Officer, the EPA Quality Assurance Manager, and the NOAA Quality Assurance Manager before measurement activities are undertaken.

F. DISAPPROVED CHARGES

Upon receipt of the NOAA monthly project status and budget reports, should EPA identify costs that EPA disputes are within the terms of the IAG, the EPA RPM will identify in writing those costs to the NOAA Project Manager, stating EPA's objections to the costs, and requesting further clarification and/or documentation of costs. NOAA will have ten working days to respond to this in writing. Should the EPA RPM and the NOAA Project Manager be unable to resolve the issue at their level within thirty days after EPA's receipt of the NOAA documentation, the EPA Region 9 Site Cleanup Branch will notify the Cincinnati cost center of the dispute and will contact NOAA to request dispute resolution.

G. DISPUTE RESOLUTION

Should a dispute arise over charges disapproved by EPA under the IAG, the interpretation of the provisions of this IAG, or should a dispute arise regarding the NOAA approach to project management or field management at the Site, such that the issues cannot be resolved by the EPA RPM and the NOAA Project Manager within a reasonable period of time, the EPA Region 9 Site Cleanup Branch will formally notify NOAA, or NOAA will formally notify the EPA Region 9 Site Cleanup Branch, as specifically as possible of the nature of the dispute. EPA and NOAA will jointly convene a fact-finding session as soon as possible with the goal of identifying a potential resolution to the conflict. Such resolution will be proposed to the appropriate levels of EPA and NOAA management for review and approval. Should a dispute still exist, the matter will be referred to the Washington, D.C., headquarters of both agencies for resolution.

H. COST DOCUMENTATION REQUIREMENTS

EPA, acting as manager of the Hazardous Substances Superfund, requires current information on CERCLA response actions and related obligations of CERCLA funds for these actions. In

addition, CERCLA, as amended by SARA, authorizes EPA to recover from responsible parties all government costs incurred during a response action. To assure oversight and successful recovery of CERCLA funds, NOAA accounting system reports must be supported by site- and activity-specific cost documentation. NOAA shall organize and retain in a site file, for ten years after the completion of the project or until transferred to EPA for permanent retention, documentation of costs by site and activity (e.g., vouchers, billing statements, evidence of payment, audit reports) as follows:

1. Direct Costs
   - Payroll: timesheets/time cards identified by site and time period and signed by supervisor that support hours charged to the site;
   - Travel: travel authorizations (including purpose of trip), local travel vouchers, traveler's reimbursement vouchers, carrier bills (including airline tickets, government-owned vehicle bills, and all appropriate hotel, car rental, etc., receipts;
   - Contractor services: copies of contracts, requests for proposals (RFPs), detailed evaluation of contractor bids, contractor invoices, NOAA project officer approval of invoices, proof of payment;
   - Supplies and equipment: Property inventory listing of all non-expendable property with a unit acquisition cost of $1,000 or more, and with a life expectancy of one year or more requires EPA authorization for purchase), vendor invoices, proof of payments, and records of hourly equipment use when applicable; and
   - Any other direct costs not included in the above categories.

2. Indirect Cost Documentation
NOAA shall certify the following:

Any indirect costs included in billings to the EPA represent, in accordance with GAO principles, indirect costs that are funded out of the currently available appropriations and that bear a significant relationship to the performing of the service or work; explicit statutory authority exists for charging other than the incremental costs of performance; if an audit determines that any direct or indirect costs charged to the EPA are unallowable, the EPA shall be notified immediately following the resolution of the audit and the EPA shall be credited with those costs.

3. Cost Recovery

In the event of a cost recovery action, within six weeks from the date of a request from EPA or the Department of Justice, NOAA shall provide to EPA or the Department of Justice site-specific costs and copies of the back up documentation which support those costs. NOAA shall provide EPA with a contract for obtaining such site-specific accounting information and documentation. This cost information and documentation must also be available for audit and verification upon request by the Inspector General.

I. OTHER DIRECTIVES

Nothing herein is intended to conflict with current EPA or NOAA directives. If the terms of this agreement are inconsistent with existing directives of either of the agencies entering into this IAG, then those portions of this IAG which are determined to be inconsistent shall be invalid; but the remaining terms and conditions not affected by the inconsistency shall remain in full force and effect. At the first opportunity for review of the IAG, all necessary changes will be accomplished by either an amendment to this IAG or by entering into a new IAG, whichever is deemed expedient to the interest of both parties.

J. OTHER EPA INVOLVEMENT

Payment to NOAA is contingent upon receipt of a NOAA-certified payment request. Reimbursement to NOAA for in-house costs is contingent upon receipt of an NOAA-certified reimbursement for request (SF 1080). Final project payments for specific contracts and in-house costs shall be reviewed and approved by the EPA Regional program office.

EPA will hold title to all property acquired with Superfund monies. EPA will provide NOAA with the property disposition instructions upon termination of the IAG. EPA will receive fair-market value for any property disposed of or used for non-Superfund activities.

K. DURATION OF AGREEMENT, AMENDMENTS OR TERMINATION

This Agreement will become effective when signed by all Parties. The Agreement will remain in effect through September 30, 2005, unless either terminated by (1) mutual written consent, (2) 30 days advance written notice by either Party, or (3) completion of the operation/terms of this Agreement.

This Agreement may be amended at any time within the scope of this instrument, extended or renewed through the written mutual consent of the Parties. The Parties will review this Agreement at least once every three years to determine whether it should be revised, renewed, or canceled.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MEMORANDUM

DATE: July 30, 2002

SUBJECT: Approval of Interagency Agreement (IAG) between EPA and U.S. Department of Commerce, National Oceanic and Atmospheric Administration

FROM: Frederick K. Schauffler, EPA Project Officer (SFD-7)
Site Cleanup Branch, Superfund Division

THRU: John Kemmerer, Chief
Site Cleanup Branch (SFD-7)

THRU: Vance Fong, Chief
Quality Assurance Program (PMD-3)

TO: Melinda Taplin, PMD-7
Grants Management Office

CERTIFIED APPROVAL

1. I was certified as an IAG Project Officer in March 1998.

2. Attached is a proposed IAG with the U.S. Department of Commerce, National Oceanic and Atmospheric Administration (NOAA) in the amount of $882,500. The Award Official's signature on the official IAG award document serves as approval of subject IAG.

OBJECTIVES AND DESCRIPTION

3. I certify that this IAG is consistent with the EPA Program's mission. The cost of the proposed work is reasonable based on an independent estimate of cost or other appropriate cost information developed by EPA.

The IAG's project objectives are to facilitate coordination between the EPA and the Natural Resource Trustee agencies (of which NOAA is the lead agency for this site) in the implementation of public outreach and fish monitoring activities related to the contaminated sediments at the Palos Verdes Shelf and, by doing so, to enhance the efficiency and effectiveness of each entity's efforts in these areas.

- The IAG will accomplish the objectives by enabling NOAA to provide technical services to EPA in areas of mutual interest with respect to the Palos Verdes Shelf (i.e., public outreach and fish monitoring) that each agency would otherwise undertake independently. The services that NOAA will provide to EPA are components of the overall institutional controls response action that EPA is implementing for the Palos Verdes Shelf site. The various components of EPA's overall program are described in EPA's Institutional Controls Implementation Plan, and the work to be performed by NOAA pursuant to this IAG consists of specific items within that Plan. In a similar way, the activities described in the attached SOW are components of the Trustees' resource restoration project planning work for the Palos Verdes Shelf and adjoining areas of the Southern California Bight.

- The alternatives to the IAG I considered were the use of a contractor via the EPA Region 9 Response Action Contract (RAC) and the use of a cooperative agreement with California's State Water Resources Control Board to fund the Santa Monica Bay Restoration Project (SMBRP) to perform the work. Using either of these approaches, EPA would in effect be implementing its monitoring program and certain outreach activities independent of the Trustees.

- The IAG was selected because it will provide an efficient and cost-effective means for EPA implement these actions in a manner consistent with the similar work being performed by the Trustees. While the RAC contractor has been working on the Montrose Chemical Superfund site, that work has focused on the plant property and not on the issues associated with the Palos Verdes Shelf contaminated sediments. From a contract and project management perspective, bringing a relatively new party into the work who is unfamiliar with much of the PV Shelf site history would be time consuming and inefficient. SMBRP would not have sufficient staff in the near term to implement the work described in the SOW because of limited staff resources and hiring restrictions.

- The Other Agency was selected because NOAA, through its Montrose Settlements Restoration Program, has the necessary staff to procure and oversee the contractors needed to conduct the work. Similarly, when it comes to public outreach, EPA and NOAA have been working closely over the last few years in conducting outreach activities for what is, in effect, the same audience despite the different missions of the two agencies. NOAA also has significant experience in areas such as fish monitoring and the ability to draw upon the expertise of local marine scientists from academia and elsewhere that are essential to developing a scientifically sound monitoring program.

STATUTORY AUTHORITY

4. The statutory authority for the activities/transfer of funds is the Economy Act of 1932, as amended (31 USC 1535). The IAG's project activities and provisions are consistent with the Economy Act, CERCLA, as amended (42 USC 9610), the National Contingency Plan (NCP), Executive Order 12580, EPA IAG Policy and Procedures Compendium, Chapter 51, EPA Assistance Administration Manual, and the Superfund Comprehensive Accomplishments Plan (SCAP). This IAG does not include international activities. This IAG will further government economy and efficiency by using existing specialized expertise of NOAA.

- A completed Region 9 Determination & Findings (D&F) form is attached.

QUALITY ASSURANCE STATEMENT

5. This IAG involves the generation of environmental data. A Quality Assurance Project Plan (QAPP) must be developed for the activities planned. The EPA guidance document, 'EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations,' (EPA QA/R-5, Interim Final, August, 1994), or any guidance that supersedes this document, should be used when preparing the QAPP. The QAPP must be approved by the EPA Project Officer, the EPA Region 9 Quality Assurance Manager, and the IAG recipient's quality assurance manager, before measurement activities are undertaken. The QAPP should be submitted no later than August 15, 2002.

PROJECT PERIOD

6. a) The project period is 7/15/2002 to 9/30/2005 and the budget period is 7/15/2002 to 9/30/2005.

b) The project activities conducted prior to execution of the IAG are initiation of the angler study and planning for the fish monitoring task.

It was necessary to initiate these activities prior to the execution of the IAG because the data needed for the angler study requires information regarding summer fishing activity, i.e., deployment of field teams during the summer fishing season. In order to allow sufficient lead for its contractor to meet this objective, NOAA had to begin work on this activity before the IAG was executed. Similarly, the fish sampling activity needs to fall within a window of opportunity that runs from late August to early October, thus requiring NOAA to begin planning and contracting activities before execution of the IAG.

Therefore, Frederick K. Schauffler authorized these activities to be conducted before execution.

7. a) **Superfund** ($F) Site number, name, city, state are:

EPA ID# CAD008242711 (SSID #09CA), Palos Verdes Shelf, Los Angeles, CA.

EQUIPMENT / PROPERTY

8. Other Agency and/or its contractors are NOT authorized to purchase property/equipment under this IAG.

BUDGET - TRAVEL

9. I have verified with Pamela G. Castens from NOAA(?) that the proposed travel is necessary for the project and the IAG is not for the purpose of augmenting a travel ceiling.

CONDITIONS

10. - **DBE/MBE/WBE**

As a recipient of monies under this IAG, the Dept. of Commerce must ensure to the fullest extent possible that at least 8% of funds for prime or subcontracts and subgrants for services are made available to businesses owned or controlled by socially and economically disadvantaged individuals, women-owned businesses, and Historically Black Colleges and Universities.

The Dept. of Commerce must submit a report to EPA showing the actual amount and percentage of extramural funds awarded to Disadvantaged Business Enterprise's (DBE) on EPA Forms 6005-3, "Superfund Minority Contractors Utilization Report", and 6005-3A, "Superfund Minority Contractors Utilization Report - Part 2", by November 15, of each calendar year. Reports should be submitted to:

Office of Small and Disadvantaged
Business Utilization (1230C)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

- SUPERFUND COST RECOVERY & RECORD RETENTION:

The Dept. of Commerce agrees to meet the site-specific financial management and cost recovery record keeping requirements set forth in the handbook, dated January, 1989 "Superfund Financial Management and Record keeping: Guidance for Federal Agencies". All such records must be maintained for a least ten years from the date of submission of the final payment, after which written approval must be obtained from the EPA award official before disposing of any records.

- BILLING BACKUP INFORMATION

When requesting payments, a breakdown of the costs associated with the billing request must be provided to the EPA Project Officer (PO). (The breakdown of the costs should be at least by budget category as indicated on this Interagency Agreement's page 2 "Approved Budget", BOX 22.) The breakdown of cost information should be adequate to allow the PO to determine that costs billed to EPA are necessary and reasonable. If the information is not provided, the EPA PO will notify the Financial Management Division to suspend or charge back the payment.

14. Please include the following programmatic conditions in the IAG:

This IAG involves the generation of environmental data. A Quality Assurance Project Plan (QAPP) must be developed for the activities planned. The EPA guidance document, 'EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations,' (EPA QA/R-5, Interim Final, August, 1994), or any guidance that supersedes this document, should be used when preparing the QAPP. The QAPP must be approved by the EPA Project Officer, the EPA Region 9 Quality Assurance Manager, and the IAG recipient's quality assurance manager, before measurement activities are undertaken. The QAPP should be submitted to EPA no later than August 15, 2002.

ACCOUNTING INFORMATION

15. I have attached a Commitment Notice to this decision memo.

16. If you have any questions, please call me at (415) 972-3174.

Attachments: COMMITMENT NOTICE
DRAFT IAG with Statement of Work

July 2002

STATEMENT OF WORK

EPA REGION 9/NOAA IAG
Palos Verdes Shelf Superfund Investigation
Los Angeles, California

I. PURPOSE

The U.S. Environmental Protection Agency (EPA) and the National Oceanic and Atmospheric Administration (NOAA), through the Montrose Settlements Restoration Program (MSRP), are both planning to undertake public outreach and fish monitoring activities related to the contaminated sediments at the Palos Verdes Shelf. The purpose of this Interagency Agreement (IAG) is to facilitate coordination between the two agencies, enhance the efficiency and effectiveness of each agencies efforts in these areas, and enable NOAA to provide technical services to EPA in areas of mutual interest with respect to the Palos Verdes Shelf.

II. BACKGROUND

Site Description and History

The Palos Verdes Shelf site is a large area of contaminated sediment located on the continental shelf and adjacent slope off the coast of the Palos Verdes peninsula in the county of Los Angeles, California. The primary contaminants of concern ("COCs") in the sediment can be grouped into two categories: 1) dichloro-diphenyl-trichloroethane ("DDT") and its metabolites, and 2) polychlorinated biphenyls ("PCBs").

Between 1950 and 1972, the Montrose Chemical Corporation of California manufactured the organochlorine pesticide DDT at its Torrance plant and discharged wastewater containing DDT to the local sewers, where it was conveyed to the Joint Water Pollution Control Plant ("JWPCP") owned and operated by the County Sanitation Districts of Los Angeles County ("LACSD"). Other commercial and industrial facilities discharged PCBs to the sewer system feeding the JWPCP. Wastewater from the JWPCP is discharged to the Pacific Ocean through submarine outfalls located off White's Point on the Palos Verdes peninsula. It is estimated that over 1,700 tons of DDT were discharged by the JWPCP from the late 1950s to the early 1970s. DDT & PCBs which passed through the JWPCP were discharged through the White's Point sewer outfalls, resulting in a large "effluent-affected" (i.e., contaminated) sediment deposit on the continental shelf and slope.

The DDT contamination on the Palos Verdes Shelf and in the Southern California Bight has been the subject of scientific studies since the early 1970s. In 1990, federal and state natural resource trustees (collectively referred to as the "Trustees"), including NOAA, filed a natural resource damage claim against Montrose and other parties and began an extensive site characterization as part of a natural resources damage assessment ("NRDA") under CERCLA. The

resulting expert reports were issued in October 1994. In July 1996, following a 19-month review of the data and information regarding contamination on the Palos Verdes Shelf, EPA formally initiated an engineering evaluation/cost analysis (EE/CA) under the Superfund program to evaluate both risks to human health and the environment and possible response actions to address those risks.

In 2001, the litigation over natural resource damage claims and future EPA cleanup actions was resolved when the last of four settlements with potentially responsible parties (PRPs) was approved by the District Court. These settlements provided funds to both EPA and the Trustees to undertake site cleanup response actions and resource restoration projects, respectively. Both groups are now actively planning and implementing their programs.

Nature and Extent of Contamination

The total volume of the effluent-affected sediment deposit is over 9 million cubic meters, with approximately 70% of this volume on the continental shelf (i.e., in water depths less than 100 m) and the remainder present on the continental slope. Virtually all of the deposit is contaminated with DDT (including its metabolites DDD and DDE) and PCBs. (Hereafter, "DDT" refers to the sum of DDT and its metabolites.) The footprint of DDT-contaminated sediment, delimited at the 1 part per million (ppm) surface concentration level of p,p'-DDE covers a sea floor surface area in excess of 43 square kilometers on the shelf and slope. The accumulated masses of DDT and PCBs at the PV Shelf have been estimated at 110 and 11 tons, respectively.

The area of highest DDT and PCB contamination is located on the continental shelf, and the maximum concentrations of DDT and PCBs within the sediment deposit are typically below the surface layer. The maximum concentration of DDT exceeds 200 ppm near the outfall pipes; concentrations in excess of 50 ppm extend up to 4 kilometers (km) to the west of the outfalls.

California EPA's Office of Environmental Health Hazard Assessment (OEHHA) and its predecessor agency, the California Dept. of Health Services (CDHS), have issued health warnings for consumption of certain fish off Palos Verdes and other Southern California sites because of elevated DDT and PCB levels. These have been included in the California sport fishing regulations since March 1992. In 1985, the LA County Dept. of Health Services, under State guidance, posted warnings along the shore of Santa Monica Bay and Palos Verdes to discourage consumption of white croaker. In 1990, the California Dept. of Fish and Game closed commercial fishing of white croaker on the Palos Verdes Shelf and nearby areas due to health risks posed by DDT and PCB contamination. Commercial fishing for other species of fish is permitted.

Status of Site

In July 1996, EPA began the Superfund investigation known as an Engineering Evaluation/Cost Analysis (EE/CA) for the Palos Verdes Shelf. The primary activities under the EE/CA were a streamlined human health and ecological risk assessment, along with an evaluation of

response action technologies and alternatives focused on in-situ capping options and institutional controls (along with the no action alternative). In March 2000, EPA completed the EE/CA report on the Palos Verdes Shelf and released it for public comment, along with EPA's proposed institutional controls response action to address human health risks (a combination of public outreach, monitoring and enforcement). Following the public comment period, EPA issued an Action Memorandum in September 2001 and has begun implementation of the institutional controls program. EPA's evaluation of capping is still ongoing.

III. DESCRIPTION OF TASKS

Pursuant to this IAG, NOAA will perform one or more of the following tasks as directed by EPA's Remedial Project Manager (RPM) for the Palos Verdes Shelf:

- Task 1: Project Management and Reporting
- Task 2: Angler Community Characterization and Outreach
- Task 3: Fish Sample Collection and Analysis
- Task 4: Public Outreach Support

These tasks will include the responsibilities and activities described below.

Task 1: Project Management and Reporting

1) Provide overall technical and financial management of the project;

2) Direct and monitor NOAA resources;

3) Coordinate activities with and receive direction from the EPA RPM;

4) Maintain overall responsibility for keeping the project on schedule and within the approved IAG budget; and

5) Provide reporting to EPA as described under Special Conditions and assist EPA in responding to comments on and questions about the work performed by NOAA for EPA.

Task 2: Angler Community Characterization & Outreach

Both EPA and NOAA need to communicate effectively with anglers in the process of developing and implementing their respective programs. As part of its institutional controls response action, EPA plans to conduct outreach activities for recreational fishing community, which include characterizing the angler community for the purpose of targeting future outreach activities more

effectively and efficiently. Such a study is also a critical up-front item for the MSRP, as it will be used not only to define the communities affected by the injuries in the case, but also to develop targeted outreach programs to involve those communities in the restoration planning effort, already underway.

EPA has conducted some work with community-based organizations ("CBOs") to assist in determining the ethnic communities that need to be addressed in the outreach efforts, and which outreach methods and materials are most effective for a given community. Heal the Bay conducted a brief pier survey in the summer of 2001 which generated some recent information on the demographics of the angler community. However, the latest comprehensive effort to collect angler information was completed in 1991 by the Santa Monica Bay Restoration Project, and there is a clear need to update these data, as well as expand the study area into Orange County.

The general public has already expressed difficulty in separating out the roles and responsibilities of EPA versus the Trustees (i.e., site remediation and mitigating the human health risks associated with the consumption of contaminated fish versus restoring the natural resources injured by the discharges). To the public, and indeed in actuality, these responsibilities are related, together forming the complete approach toward resolving the issues caused by the contamination. There is an obvious need for coordination between the two programs, and independent execution will undoubtedly result in fiscal inefficiencies and potentially conflicting messages sent to the public about "clean" fishing and opportunities created for that purpose. Commercial fishing issues, sports fishing concerns, and subsistence fishing activities have all been affected by the discharges in question, and for EPA and the Trustees to execute many of their outreach and education program tasks independently will result in sending a message not only that government does not have the capability to work together across inter-agency lines, but that restoration and remediation dollars are being spent unwisely and ineffectively on duplicative efforts.

Accordingly, EPA and the MSRP plan to merge the common elements of their outreach programs efforts where appropriate, presenting to the public where possible a joint program that explains all sides of the efforts to clean up and restore the environment affected by the Montrose discharges.

2.1 Conduct Pier/Marina Angler Study

NOAA will conduct a study of anglers at piers and marinas serving fishing locations near to or impacted by contaminated fish from the Palos Verdes Shelf. The study will be conducted to determine such aspects of the angler community as ethnic composition, language capabilities, current knowledge of contamination issues, and preferred methods for receiving information. Information will be gathered to help guide the development of additional educational materials and outreach activities. Materials developed during EPA's pilot outreach project and/or through the ongoing work of the Seafood Contamination Task Force, may be distributed as part of this study, and anglers' understanding of these materials will be assessed.

Tasks necessary to complete the study include data collection method design and development, interviewing, data reduction, and analysis. It is anticipated that the methodology will be developed by a work group that includes representatives from NOAA, CDHS, EPA and other members of the Seafood Contamination Task Force. Due to the diversity of languages spoken in the fishing community, sampling of what languages are spoken at the chosen study areas may need to be conducted prior to actual interviewing.

2.2 Train Angler Study/Outreach Workers

NOAA will develop and implement a training program for workers who will interact directly with anglers at piers and marinas, etc. EPA anticipates that angler study and outreach activities will be conducted by a consortium of contractors, community-based organizations, environmental groups and agencies located in the greater Los Angeles area, with one entity serving as the central coordinating organization. Workers who conduct the study may include summer interns or temporary hires who will need a minimum amount of training to develop a familiarity with the general issues regarding contaminated fish and familiarity with the study methodology.

2.3 Create & Distribute Outreach Materials

Outreach materials (e.g., fact sheets) containing information on fish and seafood contamination issues relevant to the recreational angler may be developed and/or reproduced in quantity for use as an outreach tool during the angler study. The materials will be easy to read and understand and may be prepared in multiple languages, as appropriate. The materials will include information about fish and fish contamination issues, especially the health advisory and emphasizing safer fish preparation and consumption practices.

Task 3: Fish Sample Collection and Analysis

Both EPA and the MSRP are developing fish sampling plans this year for implementation in September 2002. These sampling plans have several aspects in common, i.e., they envision the use of technical oversight boards, have similar sampling time frames, address the same and/or immediately adjacent geographic locations, and will occur over similar (2-3 year) time frames. The MSRP has already convened a comprehensive Scientific Review Board and is well underway toward completion of a draft sampling plan. EPA is currently a member of this board. The completion of the sampling plan, SOPs and QA/QC procedures all must be completed shortly in order to ensure that implementation of both programs can occur by September 2002.

The EPA program will involve sampling fish in the ocean (similar to the MSRP program) as well as fish from retail markets and restaurants. EPA's sampling program is needed to evaluate the effectiveness of fishing restrictions and enforcement actions in eliminating the presence of contaminated fish in public markets and restaurants, as well as to support public outreach activities regarding fish consumption advisories. EPA currently has a contractor developing the sampling and analysis plan for both the ocean and market/restaurant aspects of its program.

The primary purpose of the MSRP's study is to measure the geographic pattern of contaminant levels in various fish. The results of the study would be used to determine "clean" locations for fishers and to identify potential areas or sites for restoration projects such as constructed reefs that would increase the supply of "clean" fish for local anglers.

Joint implementation of the EPA and MSRP sampling plans will result in greater efficiency and consistency between the two programs. In many instances, EPA and the MSRP have overlapping data needs, as identified in the MSRP sampling plan, and as a result the two agencies will share in the cost of gathering that data. The sample collection phase of the market/restaurant program is obviously different than the ocean sampling, but the analysis of samples is essentially the same. Therefore, EPA has included the market/restaurant sample collection and analysis within the scope of the work that may be performed under this IAG.

3.1 Fish-in-Ocean Sampling Program

As described in EPA's Action Memorandum, the primary purpose of the fish-in-ocean sampling program will be to assess whether the existing commercial fishing ban for white croaker provides consumers adequate protection from the purchase of contaminated white croaker, i.e., whether the current boundaries of the ban area are adequate. A secondary purpose is to provide data that will be useful and necessary for an effective public outreach & education program regarding fish consumption advisories. The actual parameters of the sampling and analysis program will be reviewed by an EPA Technical Review Board consisting of representatives from EPA and other agencies included on the MSRP's Scientific Review Board.

3.1.1 Work Plan for Fish-in-Ocean Sampling Program

EPA is using the original 1991 OEHHA Study as a baseline for design of the current EPA fish-in-ocean sampling program. The EPA study will include the sampling locations from the original study, as well as new locations in surrounding areas known for commercial white croaker fishing and/or areas where DDT- and PCB-contaminated fish are suspected to be present. In addition, sampling locations may include presumed "clean" areas in an effort to identify locations that will provide sport and commercial fishers access to safe white croaker and other fish. Table 1, which focuses on meeting the EPA's objectives with respect to the commercial catch ban area, presents tentative sites or locations for sample collection, as well as the tentative number and type of samples to be collected. The collection and analysis of fish for public outreach purposes will focus on locations with existing fish advisories. The actual locations will be determined after consulting and comparing plans with the MSRP and the SRB. EPA anticipates using an adaptive analysis approach in its sampling & analysis plan in which the decision to analyze some samples is based on the results from adjoining locations.

The fish-in-ocean sampling program will likely occur over a 2-year period, and will include multi-season sample collection. EPA will direct its contractor to collaborate with MSRP and members of the SRB to develop an EPA sampling and analysis plan that is focused on meeting the EPA objectives described above and consistent to the maximum extent practicable with the MSRP plans. It should be noted that EPA's sampling and analysis program must be designed in

accordance with EPA's Superfund program requirements, including those for Quality Assurance Project Plans (QAPPs) and Field Sampling Plans (FSPs).

Table 1. Potential Locations for Sample Collection to Evaluate the White Croaker Commercial Fishing Ban Area

Sampling Site	Number/Type of Samples
Palos Verdes (NW side; north of existing commercial ban area)	5 composites (4 fish each) or 20 individual white croaker
Point Vicente	5 composites (4 fish each) or 20 individual white croaker
White Point	5 composites (4 fish each) or 20 individual white croaker
South of Point Fermin (new location), near Cabrillo State beach	5 composites (4 fish each) or 20 individual white croaker
Cabrillo Pier area	5 composites (4 fish each) or 20 individual white croaker
Pier J	5 composites (4 fish each) or 20 individual white croaker
Belmont Pier	5 composites (4 fish each) or 20 individual white croaker
West End of Sunset Beach	5 composites (4 fish each) or 20 individual white croaker
Huntington Beach/Newport Pier	5 composites (4 fish each) or 20 individual white croaker
Dana Point	5 composites (4 fish each) or 20 individual white croaker
Outside LA/Long Beach Harbor Middle Breakwater	5 composites (4 fish each) or 20 individual white croaker
Horseshoe Kelp	5 composites (4 fish each) or 20 individual white croaker
2 miles offshore of Cabrillo State beach	5 composites (4 fish each) or 20 individual white croaker
5 miles SE of Pt. Fermin	5 composites (4 fish each) or 20 individual white croaker
7 miles SSE of Middle Breakwater	5 composites (4 fish each) or 20 individual white croaker
West of PV Point (before Redondo Canyon	5 composites (4 fish each) or 20 individual white croaker
West of PV Point (north side of Redondo Canyon)	5 composites (4 fish each) or 20 individual white croaker

EPA will provide MSRP with a complete set of plans (i.e., FSP and QAPP) for its fish-in-ocean monitoring program that can be incorporated into the MSRP plan for the purposes of implementation. Under this IAG, the MSRP will combine its sampling plan with EPA's to create one sampling and analysis Work Plan for implementation, and apportion all associated costs appropriately, including the costs for development of standard reference material needed for lab analysis of the samples.

3.1.2 Implement the Fish-in-Ocean Sampling & Analysis Work Plan

Actual implementation of the Work Plan will likely occur over a 2-year period, and will include collection of samples during multiple seasons, as appropriate. NOAA will provide for collection of fish and tissue samples through the use of a qualified and experienced contractor. This work will include development of the technical statement of work as part of the request for bids, and award and management of the contract(s) as necessary for studies. The technical statement of work will consist of plans and specifications and, where appropriate, quality assurance project plans (QAPPs), site safety plans, etc., and will be submitted to EPA for review before it is issued.

3.1.3 Laboratory Analysis

NOAA will evaluate and select the laboratory(ies) that will analyze the fish samples. In addition to performing the actual laboratory analyses, the laboratory will adhere to specific Quality Assurance/Quality Control (QA/QC) protocols and data validation criteria. For the purposes of developing a cost estimate for analysis of EPA samples under this IAG, it has been assumed that samples will be analyzed for DDT and PCBs. Additional analytes may be identified by EPA in its sampling plan design phase and included as appropriate, with a commensurate increase in the costs for lab analysis, data validation and reporting.

3.1.4 Data Validation and Evaluation

NOAA will provide for data validation of laboratory results, which will include, at a minimum, a review of holding times, field blanks, method blanks, quality control samples, and detection limits. Analytical data will be evaluated and summarized following each sampling event, and results provided in a report to EPA.

3.1.5 Report

Within six months after each sampling event, NOAA will provide EPA with a comprehensive report presenting the results of fish sample collection and analysis, as well as recommendations for revisions to the sampling and/or analytical program, if warranted.

3.2 Market/Restaurant Fish Sampling Program

As directed by the EPA RPM, NOAA will implement the EPA work plans for the market/restaurant sampling and analysis program in a manner consistent with the procedures and requirements of fish-in-ocean sampling program described above.

Task 4: Public Outreach Support

1) Provide support for public meetings (development of presentation materials, scheduling, meeting logistics, meeting facilities, etc.) at which the results and/or status of the activities being performed pursuant to Tasks 2 and 3 of this IAG are presented.

2) Provide support for production of fact sheets and other public outreach materials related to the work performed pursuant to Tasks 2 and 3 of this IAG.

IV. MILESTONES AND DELIVERABLES

Task	Description	Proposed Schedule/Milestones
1	Status and Budget reports	Monthly
2.1	Work Plan for Angler Study	30 days after IAG execution
	Conduct angler study	Begin August 2002
2.1	Report on Angler Study	Draft by December 31, 2002; Final within 15 days after receiving EPA comments
2.2	Draft curriculum for training program	August 15, 2002
2.3	Draft and Final copies of outreach materials	Drafts by August 15, 2002; Finals within 15 days after receiving EPA comments
3.1.1	Provide NOAA with EPA sampling/analysis plans (QAPP, FSP, etc.) (prepared by EPA contractor)	August 15, 2002
3.1.1	Work Plan for implementation of EPA & MSRP plans	August 31, 2002
3.1.2	Technical statement of work	By September 1, 2002
3.1.2	Begin field work for initial fish sampling event	By October 1, 2002
3.1.2	Conduct additional fish sample collection	TBD (at approx. six month intervals)
3.1.5	Report of results, including data validation report, for each sampling event.	Within six months of completing EPA sample collection
3.2	Work Plan and schedule for implementation of market/restaurant fish sample collection	TBD

V. SPECIAL CONDITIONS

A. PROJECT MANAGEMENT

NOAA shall designate an overall Project Manager whose role will be to:

- direct and monitor NOAA resources (including NOAA personnel and contracting mechanisms) to accomplish the tasks in the IAG statement of work on schedule and within the approved IAG budget;
- receive broad direction from the EPA RPM on actions to be taken under this IAG;
- serve as the main point of contact with NOAA for the EPA RPM; and
- report to the EPA RPM on budget status and project milestone status using the format and frequency described below.

When NOAA initially designates a Project Manager, EPA shall be given the opportunity to either accept or reject the designated individual based on an assessment of his or her technical and project management background and skills. This selection process will continue until EPA and NOAA have agreed upon a candidate. Should NOAA find it necessary to propose a change in Project Manager, NOAA shall once again propose a candidate subject to EPA's review. Should a change in Project Manager be necessary, a suitable transition period shall be negotiated between NOAA and the EPA Region 9 Site Cleanup Branch.

B. FIELD MANAGEMENT

For any field work conducted by NOAA for EPA under this IAG, NOAA shall designate an overall Field Representative whose role it will be to:

- receive direction from NOAA Project Manager;
- direct and monitor NOAA field resources (including NOAA personnel and contracting mechanisms) to accomplish the tasks in the IAG statement of work on schedule and within the approved IAG budget;
- receive broad direction from the EPA RPM during emergency situations when EPA has determined a situation has arisen that requires immediate response to mitigate a threat to human health or the environment, including the investigation of citizen complaints;
- report on an as-requested basis the overall status of field work to the NOAA Project Manager; and
- report during field work on an as-requested basis the status of current activities if requested by the EPA RPM.

NOAA will initially propose candidates for Field Representative and give EPA the opportunity to either accept or reject the designated individual based on an assessment of his or her technical and project management background and skills. This selection process will continue until EPA

and NOAA have agreed upon a candidate. Should NOAA find it necessary to propose a change in Field Representative, NOAA shall once again propose a candidate subject to EPA's review. Should a change in Field Representative be necessary, a suitable transition period shall be negotiated between NOAA and the EPA Region 9 Site Cleanup Branch.

During field work without the presence of the EPA RPM, the designated Field Representative will have responsibility for responding to direct requests from members of the community or others for information on current field activities. A record of such communication shall be maintained and forwarded to the EPA RPM.

NOAA personnel and its contractors shall have the appropriate health and safety training and be involved in a medical monitoring program as specified in 29 Code of Federal Regulations (CFR) Part 1910; 51 CFR 45663 - 45675; and Section 125(e) of CERCLA, as amended by SARA.

C. REPORTING

The designated Project Manager shall file quarterly budget and status reports directly with the EPA RPM. The reports shall cover all activity through the end of the reporting period (i.e., end of the quarter) and shall be submitted within fifteen days of the end of the reporting period. The budget status report may include the billing information sent to EPA's Servicing Finance Office in Cincinnati, but shall, at a minimum, include:

- site name as well as IAG number;
- a breakdown of expenses (personnel, travel and indirect costs) by IAG task and subtask, for the quarter and a cumulative total (this must match the lump sum on the SF-1080 submitted to the USEPA/Cincinnati Financial Management Center);
- a further breakdown of expenses identifying NOAA personnel costs and contracting costs;
- a designation of the percent of IAG task budget expended through the end of the reporting period;
- a projection as to whether the work is falling within budget; and
- a recommended corrective action should projections indicate that the project is not within budget.

The project status report shall include at a minimum:

- an overall project schedule broken out by task comparing the original IAG time line with actual milestones accomplished through the end of the reporting period;
- a narrative of significant events/activities (NOAA staff, contractors, subcontractors) during the reporting period;
- a list of deliverables submitted during the reporting period;
- a projection as to whether the work is falling within schedule;

- recommended corrective action should projections indicate the project is not within schedule;
- a narrative documenting any major or minor changes to the tasks in the IAG statement of work agreed upon by EPA and NOAA;
- any key personnel changes;
- significant events/activities in the next reporting period; and
- a narrative projecting any major issues on the horizon identified by NOAA as needing resolution and a discussion of previously-identified issues resolved during the reporting period.

EPA will provide NOAA with a sample report format.

NOAA personnel shall perform management, design and field work services in accordance with Superfund procedures and record-keeping requirements. The Project Manager shall keep the EPA RPM fully informed of all activities, and shall coordinate all meetings, reviews, inspections, etc., with the EPA RPM to accommodate attendance.

Upon receipt or completion of any site investigation, study design or monitoring-related documents, the Project Manager shall submit a minimum of four copies to EPA to allow for comment by the EPA RPM, EPA technical support staff, the California Department of Toxic Substances Control (DTSC), and for Superfund record-keeping purposes. The Project Manager shall allow for a minimum of fourteen calendar days for response, beginning with the date of EPA's receipt.

D. DOCUMENTATION OF FIELD ACTIVITIES

Information gathered during field work shall be consistently documented and adequately recorded by NOAA and/or its contractor(s) in well maintained field logs and laboratory reports. The method(s) of documentation must be specified in the work plan and/or the SAP. Field logs must be utilized to document observations, measurements, and significant events that have occurred during field activities. Laboratory reports must document sample custody, analytical responsibility, analytical results, adherence to prescribed protocols, nonconformity events, corrective measures, and/or data deficiencies.

E. QUALITY ASSURANCE/QUALITY CONTROL

Sampling and analysis plans (SAPs), consisting of a field sampling plan (FSP) and quality assurance project plan (QAPP), must be prepared for sample collection and analytical activities. The EPA guidance document, *Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans* (QAMS-005/80) (or any guidance that supersedes this document) and *U.S. EPA Region IX Guidance for Preparing Quality Assurance Project Plans for Superfund*

Remedial Projects (September 1989) should be used when preparing the QAPP. The QAPP must be approved by the EPA Project Officer, the EPA Quality Assurance Manager, and the NOAA Quality Assurance Manager before measurement activities are undertaken.

F. DISAPPROVED CHARGES

Upon receipt of the NOAA monthly project status and budget reports, should EPA identify costs that EPA disputes are within the terms of the IAG, the EPA RPM will identify in writing those costs to the NOAA Project Manager, stating EPA's objections to the costs, and requesting further clarification and/or documentation of costs. NOAA will have ten working days to respond to this in writing. Should the EPA RPM and the NOAA Project Manager be unable to resolve the issue at their level within thirty days after EPA's receipt of the NOAA documentation, the EPA Region 9 Site Cleanup Branch will notify the Cincinnati cost center of the dispute and will contact NOAA to request dispute resolution.

G. DISPUTE RESOLUTION

Should a dispute arise over charges disapproved by EPA under the IAG, the interpretation of the provisions of this IAG, or should a dispute arise regarding the NOAA approach to project management or field management at the Site, such that the issues cannot be resolved by the EPA RPM and the NOAA Project Manager within a reasonable period of time, the EPA Region 9 Site Cleanup Branch will formally notify NOAA, or NOAA will formally notify the EPA Region 9 Site Cleanup Branch, as specifically as possible of the nature of the dispute. EPA and NOAA will jointly convene a fact-finding session as soon as possible with the goal of identifying a potential resolution to the conflict. Such resolution will be proposed to the appropriate levels of EPA and NOAA management for review and approval. Should a dispute still exist, the matter will be referred to the Washington, D.C., headquarters of both agencies for resolution.

H. COST DOCUMENTATION REQUIREMENTS

EPA, acting as manager of the Hazardous Substances Superfund, requires current information on CERCLA response actions and related obligations of CERCLA funds for these actions. In addition, CERCLA, as amended by SARA, authorizes EPA to recover from responsible parties all government costs incurred during a response action. To assure oversight and successful recovery of CERCLA funds, NOAA accounting system reports must be supported by site- and activity-specific cost documentation. NOAA shall organize and retain in a site file, for ten years after the completion of the project or until transferred to EPA for permanent retention, documentation of costs by site and activity (e.g., vouchers, billing statements, evidence of payment, audit reports) as follows:

1. Direct Costs
   - Payroll: timesheets/time cards identified by site and time period and signed by supervisor that support hours charged to the site;
   - Travel: travel authorizations (including purpose of trip), local travel vouchers, traveler's reimbursement vouchers, carrier bills (including airline tickets, government-owned vehicle bills, and all appropriate hotel, car rental, etc., receipts;
   - Contractor services: copies of contracts, requests for proposals (RFPs), detailed evaluation of contractor bids, contractor invoices, NOAA project officer approval of invoices, proof of payment;
   - Supplies and equipment: Property inventory listing of all non-expendable property with a unit acquisition cost of $1,000 or more, and with a life expectancy of one year or more requires EPA authorization for purchase), vendor invoices, proof of payments, and records of hourly equipment use when applicable; and
   - Any other direct costs not included in the above categories.

2. Indirect Cost Documentation
NOAA shall certify the following:

Any indirect costs included in billings to the EPA represent, in accordance with GAO principles, indirect costs that are funded out of the currently available appropriations and that bear a significant relationship to the performing of the service or work; explicit statutory authority exists for charging other than the incremental costs of performance; if an audit determines that any direct or indirect costs charged to the EPA are unallowable, the EPA shall be notified immediately following the resolution of the audit and the EPA shall be credited with those costs.

3. Cost Recovery
In the event of a cost recovery action, within six weeks from the date of a request from EPA or the Department of Justice, NOAA shall provide to EPA or the Department of Justice site-specific costs and copies of the back up documentation which support those costs. NOAA shall provide EPA with a contract for obtaining such site-specific accounting information and documentation. This cost information and documentation must also be available for audit and verification upon request by the Inspector General.

I. OTHER DIRECTIVES

Nothing herein is intended to conflict with current EPA or NOAA directives. If the terms of this agreement are inconsistent with existing directives of either of the agencies entering into this IAG, then those portions of this IAG which are determined to be inconsistent shall be invalid; but the remaining terms and conditions not affected by the inconsistency shall remain in full force and effect. At the first opportunity for review of the IAG, all necessary changes will be

accomplished by either an amendment to this IAG or by entering into a new IAG, whichever is deemed expedient to the interest of both parties.

J. OTHER EPA INVOLVEMENT

Payment to NOAA is contingent upon receipt of a NOAA-certified payment request. Reimbursement to NOAA for in-house costs is contingent upon receipt of an NOAA-certified reimbursement for request (SF 1080). Final project payments for specific contracts and in-house costs shall be reviewed and approved by the EPA Regional program office.

EPA will hold title to all property acquired with Superfund monies. EPA will provide NOAA with the property disposition instructions upon termination of the IAG. EPA will receive fair-market value for any property disposed of or used for non-Superfund activities.

STATEMENT OF WORK

MONTROSE SETTLEMENTS RESTORATION PROGRAM
Angler Study
July 18, 2002

BACKGROUND

From the late 1940s to the early 1970s, DDTs and PCBs were discharged into the ocean near Los Angeles. More than 100 tons of these persistent chemicals remain in the marine environment and continue to injure birds and impair fishing.

In 1990, the U.S. Department of Justice (DOJ) and the California Attorney General filed a lawsuit under the federal Superfund law on behalf of the Natural Resource Trustees (NOAA, U.S. Fish & Wildlife Service, National Park Service, California Department of Fish and Game, California Department of Parks and Recreation, and California State Lands Commission), alleging that a number of defendants were responsible for releasing DDTs and PCBs and other hazardous substances into the environment. The lawsuit charged that the DDTs and PCBs injured natural resources, including fish and wildlife that live in and around coastal waters in Southern California.

The state and federal governments settled the final remaining legal claims in 2000. A total of $140 million in damages have been paid under four separate settlement agreements. The agreements provide that the Trustees may use approximately $30 million of the settlement funds for restoration of natural resources harmed by releases of DDTs and PCBs off the coast of Southern California (U.S. EPA received a separate share of the overall settlement for remediation and institutional controls to reduce exposure to DDTs and PCBs).

The Trustees have initiated the restoration planning process. They set up and are staffing the Montrose Settlements Restoration Program (MSRP) to administer the restoration efforts. They issued a Public Scoping Document on the restoration planning process and publishing a Notice of Intent to prepare an Environmental Impact Statement in the Federal Register. Three public meetings were held and comments solicited from the public during the scoping period, which closed in November 2001.

Recreational and Subsistence Fishing

One of the objectives of the Montrose Settlements Restoration Program is to develop restoration projects that compensate for injuries to recreational and subsistence fishing resulting from the contamination of fish with DDTs and PCBs. Several studies have been conducted on recreational fishing practices in Southern California. The Marine Recreational Fisheries Statistics Survey (MRFSS) is used to develop the Recreational Fishing Information Network (RecFIN) and is administered in Southern California by the Pacific States Marine Fisheries Council. The Santa Monica Bay Seafood Consumption Study was conducted in the early 1990s to develop information on human

exposures to contaminants in fish.

The Trustees and EPA have determined that they need to gain a better current understanding of who are the recreational and subsistence anglers being impacted by contamination from the Montrose case DDT and PCB releases, how they are being impacted, and how best to reach them with relevant messages. The Trustees, in conjunction with EPA, have thus decided to conduct a new study to further assess and update information on recreational and subsistence angling in Southern California coastal waters. The purpose of the study is to gather qualitative information on fishing and fish consumption practices from people who fish, for recreation and subsistence, in coastal waters from Point Dume to Dana Point in Los Angeles and Orange Counties. The Trustees and EPA want to fill specific information gaps that have not been the focus of other recreational fishing studies thus far. Qualitative information is needed for the following purposes:

1. To help guide the development of more effective public outreach and education programs intended to reduce public exposure to DDT and PCBs from fish. Information gathered from the angler survey may be used to:

   - improve the targeting of outreach programs to ensure that they reach audiences who fish for and consume fish that may be more highly contaminated with DDT and PCBs;
   - identify communication methods and languages that are more likely to effectively reach these audiences, based on their identified preferences for obtaining information, and their current awareness of fishing advisories and how they obtained that current awareness;
   - improve the effectiveness of our outreach messages about reducing contaminant exposure, through improved understanding of peoples' catch preferences, the parts of the fish they consume, and the different ways they prepare the fish for eating.

2. To gain insights on fishing preferences (types of fish and locations) that may assist the Trustees in planning restoration projects to increase the availability of acceptable opportunities to fish for cleaner fish.

The Trustees are closely coordinating restoration planning and implementation with EPA's remediation and institutional controls efforts, and combining efforts wherever it may reduce costs and improve the effectiveness of both programs. The angler study in this Task Order is an activity that the Trustees and EPA are performing as a combined effort. Thus, EPA will be an integral partner with NOAA and the Trustees in this effort.

Objectives of this Task Order

The primary objective of this task order is to implement a study of recreational and subsistence anglers who fish in Southern California coastal waters. The Trustees and EPA wish to collect information from anglers that would help in developing effective, well targeted public outreach and education programs, as well as providing information

that would help guide development of restoration alternatives for compensating anglers for DDT and PCB related impacts on recreational and subsistence angling. In addition, the Trustees and EPA intend to directly involve and take advantage of the resources of certain outside organizations in the implementation of the angler study, as described further under Activity 2.

Standards of Performance

The performance of work under this agreement will support natural resource restoration planning and implementation actions being conducted in accordance with the requirements of CERCLA, NEPA, CEQA, and other applicable federal and state environmental laws, regulations, orders, and policies. Work conducted may be open to critical review by the public and the mass media. Accordingly, all work must meet the highest standards of professional performance and technical rigor. Qualified and experienced professionals shall be utilized to design and perform the services outlined herein. Absolute objectivity must be maintained to ensure that reliable and valid conclusions are reached. Work products, guidance and recommendations, must be clearly documented and supported with relevant technical standards, methods and procedures.

Scope of Services

The Contractor shall perform the activities described below. All work shall be performed under the direction of NOAA, and in close coordination with the MSRP Program Manager and the partner organizations identified.

Activity 1: Angler Study

The contractor shall plan, organize, manage, and administer an angler study to meet the objectives stated above, including identification of locations, times, and methods, obtaining and training survey personnel, assessing and addressing likely language barriers, obtaining other needed services, preparation of the survey forms other materials, and purchase of supplies needed for the study, and creation of a database for entry and analysis of the study responses.

A committee of Trustee, EPA, and other knowledgeable participants has drafted a specific set of questions to be used in the study. The questions are being reviewed by NOAA management to assure that they comply with all applicable government requirements. The Trustees estimate that the study instrument will consist of twelve or fewer questions requiring ten minutes or less to administer to each respondent. A draft list of questions is attached to this SOW as Exhibit A.

The study questions will have been field tested prior to initiation of the full study (the field test is being performed under a previous task order and is thus outside the scope of this task order). In addition the questions themselves, the initial field test is being directed at identifying foreign language skills likely to be needed in some locations

during the full study. The results of the field test, including information on suggested language translation needs and locations, will be provided to the contractor on or around June 30, 2002. The contractor's work plan should present an approach for administering the study in a manner that maximizes the ability to obtain answers from non-English speakers in a cost-effective fashion, assuming as many as five other languages may be encountered. (It may be possible to identify and obtain translation assistance from certain community organizations in the trustees' contact list.)

The Task Order Manager will also provide the contractor an electronic spreadsheet file (Exhibit B) containing a list of the locations in Los Angeles and Orange Counties where the Pacific States Marine Fisheries Commission administers the RecFIN study. This file may be useful as an initial universe of potential sites for administering the angler study. Working with the MSRP Project Manager, the contractor shall propose specific sites where the angler study is to be administered, so that sufficient coverage is obtained to assure that as many segments of the fishing public are sampled through the study as possible.

For the purposes of scoping the level of effort and costs under this activity, the contractor may assume that the study will be administered over a period of approximately three months, in up to 50 locations consisting of a mix of public fishing piers, beaches, man-made structures, boat ramps, marinas, and private fishing party boat disembarkation sites. The total number of people to whom the study will be administered has not been determined. Thus the contractor should recommend a target for the total number of people to be surveyed, and provide in Section II of the work plan an estimated total cost based on that target, and in addition supply in Section II an estimated unit cost for each questionnaire to be administered, or cost per unit time of field effort.

The Contractor shall also incorporate into their plans for the study the utilization of staff from agencies and organizations which have indicated to the Trustees and EPA a desire to be actively involved in the study. The following list of agencies and organizations have requested direct involvement/ participation in the angler study:

Agency or Organization	**Point of Contact**	**Phone**	**Nature of Services to be Provided**
Santa Monica Bay Restoration Project	Guang Su Wang	To Be Provided	Provide personnel to administer study at Cabrillo Pier
Heal the Bay	Mark Gold	To Be Provided	Provide personnel to administer study at locations to be specified
Cabrillo Aquarium	TBD	To Be Provided	Provide personnel to administer study at locations to be specified
SEA Lab	TBD	To Be Provided	Provide personnel to administer study at locations to be specified
Los Angeles Conservation Corps	TBD	To Be Provided	Provide personnel to administer study at locations to be specified

The contractor shall deliver the results of the angler study as an electronic database and a summary report. The electronic database provided should be of a nature that will allow

Trustees and EPA to further manipulate the data results on their own in the future. The work plan should propose how the contractor will design the database to facilitate data entry and analysis.

The Contractor will be responsible for delivering the final product by effectively managing the effort through their own resources while to the extent possible utilizing the resources of partner organizations listed above.

Deliverables and Schedule

Deliverable	**Days from Award of Task Order**
Activity 1.	
Progress report/ checklist of preparations to initiate the field effort	**20 days**
Initiate field effort	**45 days**
Conclude field effort	**135 days**
Data analysis and draft report	**165 days**
Final report and database	**210 days**